

### **Regulatory Analysis**

Notice of Intended Action to be published: 481—Chapter 740  
“Licensure of Speech Pathologists and Audiologists”

Iowa Code section(s) or chapter(s) authorizing rulemaking: 147F.1, 154F, 272C.3, and 272C.10  
State or federal law(s) implemented by the rulemaking: Iowa Code chapters 17A, 147, 154F, and 272C, and section 147F.1

#### *Public Hearing*

A public hearing at which persons may present their views orally or in writing will be held as follows:

March 10, 2026  
9 a.m.

6200 Park Avenue  
Des Moines, Iowa  
[Google Meet](#)  
PIN: 690 063 141#  
Or dial: +1 224.908.0585

Virtual participation information will be available on the Department of Inspections, Appeals, and Licensing’s website prior to the hearing.

#### *Public Comment*

Any interested person may submit written or oral comments concerning this Regulatory Analysis, which must be received by the Department no later than 4:30 p.m. on the date of the public hearing. Comments should be directed to:

Venus Vendoures Walsh  
Department of Inspections, Appeals, and Licensing  
6200 Park Avenue  
Des Moines, Iowa 50321  
Phone: 515.242.6529  
Email: [venus.vendoures-walsh@dia.iowa.gov](mailto:venus.vendoures-walsh@dia.iowa.gov)

#### *Purpose and Summary*

The proposed amendments define the requirements for participation in the Audiology and Speech-Language Pathology Interstate Compact, add background check requirements for all applicants and existing license holders, add background check requirements during license reactivation when a license has been inactive for two or more years and the licensee cannot provide evidence of active practice in another state, add a fee for the issuance of a compact privilege to practice in Iowa, and waive the compact privilege fee for an active duty military member or spouse.

#### *Analysis of Impact*

**1. Persons affected by the proposed rulemaking:**

• **Classes of persons that will bear the costs of the proposed rulemaking:**

There is no direct cost to the general public, but there is a cost to the applicant or licensee since complying with the minimum requirements to enter into the compact are at the expense of the applicant or licensee.

• **Classes of persons that will benefit from the proposed rulemaking:**

The benefits achieved justify the costs. These minimum requirements for compact privilege holders ensure that practitioners are competent to practice. Without having an established threshold for entry into the professions of speech pathology and audiology, individuals who are not appropriately trained could harm the public. The Board of Speech Pathology and Audiology believes the benefits achieved by background checks and fees for these professions justify the costs because the background checks and fees ensure that Iowans are treated by competent and qualified practitioners with knowledge of topics pertinent to the professions to ensure the safety and welfare of the public. These proposed amendments highlight the need for privilege holders to understand and follow Iowa's laws and rules while serving Iowans.

**2. Impact of the proposed rulemaking, economic or otherwise, including the nature and amount of all the different kinds of costs that would be incurred:**

- **Quantitative description of impact:**

Educational institutions provide training for speech pathologists and/or audiologists. Additional private industries and educational institutions provide examinations and materials for preparation for the examination. Compact privilege fees are \$60. Privileges expire at the time the home state license expires.

- **Qualitative description of impact:**

Establishing minimum requirements for compact privileges ensures safety for the compact privilege holder and consumer. The cost of inaction would increase the potential for injury to the public by a compact privilege holder who is not qualified to perform work in the field.

**3. Costs to the State:**

- **Implementation and enforcement costs borne by the agency or any other agency:**

Costs to the agency are the staff time needed to manage Board activities. This includes a new background check process; database updates and initial implementation of the Audiology and Speech-Language Pathology Interstate Compact; database maintenance; and education of the public, licensees, and privilege holders. Compact privilege holders are subject to the laws and rules of Iowa and may be investigated or disciplined by the Board. Consent agreements and discipline imposed by the Board are monitored by office staff.

An executive officer supports the full scope of this work at 0.20 full-time equivalent (FTE) position. This includes reviews at the time of initial application and reactivation and during reinstatement.

- **Anticipated effect on State revenues:**

Costs associated with implementing these proposed amendments will be offset by the fees collected by compact privilege holders.

**4. Comparison of the costs and benefits of the proposed rulemaking to the costs and benefits of inaction:**

The Board believes all current requirements ensure public safety and ensure minimum competency.

**5. Determination whether less costly methods or less intrusive methods exist for achieving the purpose of the proposed rulemaking:**

The Board has not identified a more cost-effective alternative for compliance with Iowa Code section 147F.1, which outlines Iowa's role as an Audiology and Speech-Language Pathology Interstate Compact member state.

**6. Alternative methods considered by the agency:**

- **Description of any alternative methods that were seriously considered by the agency:**

The agency currently supports multiple compacts. Adding the Audiology and Speech-Language Pathology Interstate Compact to the database ensures public safety, minimum competence of the compact privilege holder and compliance with Iowa Code section 147F.1.

- **Reasons why alternative methods were rejected in favor of the proposed rulemaking:**

The Board has not identified a more cost-effective alternative to the current internal process utilized for licensure review and compliance audits. The Board believes all current requirements ensure public safety and ensure a minimum competency of care is provided to Iowans. The proposed amendments provide consistency related to the licensure of speech pathologists and audiologists across the United States, and membership in each compact requires the uniform licensure of these providers. The Department continues to assess and implement opportunities to increase efficiencies and standardize Board processes across all professional licensing boards. These proposed amendments support this effort.

*Small Business Impact*

**If the rulemaking will have a substantial impact on small business, include a discussion of whether it would be feasible and practicable to do any of the following to reduce the impact of the rulemaking on small business:**

- Establish less stringent compliance or reporting requirements in the rulemaking for small business.
- Establish less stringent schedules or deadlines in the rulemaking for compliance or reporting requirements for small business.
- Consolidate or simplify the rulemaking's compliance or reporting requirements for small business.
- Establish performance standards to replace design or operational standards in the rulemaking for small business.
- Exempt small business from any or all requirements of the rulemaking.

**If legal and feasible, how does the rulemaking use a method discussed above to reduce the substantial impact on small business?**

These proposed amendments relate to public safety concerns that are present whether the business is a small business or a large organization. These proposed amendments are meant to ensure public safety in terms of licensing requirements for audiologists and speech pathologists. To exempt a small business from adhering to these proposed amendments would jeopardize any member of the public who sought services from that small business. The risk to the public is greater than the potential harm or cost to the small business.

*Text of Proposed Rulemaking*

ITEM 1. Amend rule **481—740.1(147)**, definitions of “Reactivate” and “Speech pathologist,” as follows:

“*Reactivate*” or “*reactivation*” means the process as outlined in rule ~~481—740.11(17A,147,272C)~~ 481—740.10(17A,147,272C) by which an inactive license is restored to active status.

“*Speech pathologist*” or “*speech-language pathologist*” means a person who engages in the application of principles, methods, and procedures for the measurement, testing, evaluation, prediction, consultation, counseling, instruction, habilitation, rehabilitation, or remediation related to the development and disorders of speech, swallowing, fluency, voice, or language for the purpose of nonmedically evaluating, preventing, ameliorating, modifying, or remediating such disorders and conditions in individuals or groups of individuals.

ITEM 2. Adopt the following **new** definitions of “DCI,” “Department” and “FBI” in rule **481—740.1(147)**:

“*DCI*” means the Iowa division of criminal investigation.

“*Department*” means the department of inspections, appeals, and licensing.

“*FBI*” means the Federal Bureau of Investigation.

ITEM 3. Rescind rule 481—740.2(147) and adopt the following **new** rule in lieu thereof:

**481—740.2(147) Initial licensure.** The following criteria will apply to licensure:

**740.2(1)** Applicants will submit a completed online licensure application and pay the nonrefundable licensure fee specified in rule 481—507.20(147,154F).

**740.2(2)** Application requirements.

*a.* Applicants who did not complete the nine months of clinical experience under supervision of a licensed Iowa speech pathologist or audiologist, as appropriate, must submit:

- (1) An official copy of a current ASHA certificate of clinical competence; or
- (2) Verification of current ABA certification.

*b.* Applicants who complete the nine-month clinical experience under Iowa supervision may submit evidence of licensure requirements as outlined in paragraph 740.2(2)“*a*” or must submit the following:

- (1) Official copies of academic transcripts sent directly from the school to the board showing proof of completion of not less than 400 hours of supervised clinical training; and
- (2) Verification of nine months of full-time clinical experience, or equivalent, completed after the master’s degree, under the supervision of a licensed speech pathologist or audiologist or as a part of the doctoral degree.

*c.* Results of the Praxis Examination.

**740.2(3)** Applicants will submit required waivers and fingerprints pursuant to the board-approved process to facilitate a national criminal history background check by the DCI and the FBI. The cost of the criminal history background check by the DCI and the FBI shall be assessed to the applicant.

**740.2(4)** An applicant who has been licensed in the District of Columbia or another state, territory, province or foreign country who has been a licensed speech pathologist or audiologist under the laws of another jurisdiction will provide verification of license from the jurisdiction in which the applicant has most recently been licensed sent directly from the jurisdiction to the board office. The applicant must also disclose any public or pending complaints against the applicant in any other jurisdiction. Web-based verification may be substituted for verification direct from the jurisdiction’s board office if the verification provides:

- a.* Licensee’s name;
- b.* Date of initial licensure;
- c.* Current licensure status; and
- d.* Any disciplinary action taken against the license.

**740.2(5)** An applicant who has relocated to Iowa from a state that did not require licensure to practice the profession may submit proof of work experience in lieu of educational and training requirements, if eligible, in accordance with rule 481—501.2(272C).

**740.2(6)** If the application is not completed according to the instructions, the application will not be reviewed by the board.

ITEM 4. Rescind subrule 740.3(2) and adopt the following **new** subrule in lieu thereof:

**740.3(2)** Foreign-trained applicants.

*a.* Foreign-trained speech pathologist and audiologist applicants who do not hold a license in another state or U.S. territory shall provide an English translation and an equivalency evaluation at the licensee’s expense of the licensee’s educational credentials by one of the approved credential evaluation services on ABA’s or ASHA’s websites or approved by the board. The professional curriculum must be equivalent to that stated in these rules.

*b.* Foreign-trained applicants who hold a license in another state or U.S. territory may apply for licensure by endorsement.

ITEM 5. Rescind rule 481—740.5(147) and adopt the following **new** rule in lieu thereof:

**481—740.5(147) Audiology and speech-language pathology interstate compact.** The rules of the audiology and speech-language pathology interstate compact commission are incorporated by

reference pursuant to Iowa Code section 147F.1. An audiologist or speech-language pathologist may engage in the practice of audiology or speech-language pathology in Iowa without a license issued by the board if the individual has a current compact privilege to practice in Iowa issued by the audiology and speech-language pathology interstate compact commission. The state fee for issuance of a compact privilege to practice in Iowa shall be \$60, which will be collected by the speech-language pathology interstate compact commission. The state fee for issuance of a compact privilege to practice in Iowa shall be waived for an active-duty military member or spouse of an individual who is an active-duty military member. An audiologist or speech-language pathologist who practices audiology or speech-language pathology in Iowa using a compact privilege is subject to the rules governing licensees in rule 481—740.8(147) and in 481—Chapters 741 and 743. Complaints, investigations, and disciplinary proceedings involving a compact privilege shall be handled in accordance with Iowa Code chapters 17A, 147F, 154F and 272C and with 481—Chapters 503, 504, and 506.

ITEM 6. Rescind rule **481—740.9(147)**.

ITEM 7. Amend paragraph **740.10(3)“a”** as follows:

*a.* Meet the continuing education requirements of rule 481—742.2(147) and the mandatory reporting requirements of subrule ~~740.10(4)~~ **740.9(4)**. A licensee whose license was reactivated during the current renewal compliance period may use continuing education credit earned during the compliance period for the first renewal following reactivation; and

ITEM 8. Amend paragraph **740.10(4)“b”** as follows:

*b.* The board may select licensees for audit of compliance with the requirements in paragraphs ~~740.11(4)~~ **740.10(4)“a”** and **“b.”**

ITEM 9. Adopt the following **new** subrule 740.10(9):

**740.10(9)** Compact eligibility review. This rule applies to licensees who were licensed prior to enactment of this rule. In order to complete the compact eligibility review, at or prior to a licensee’s next renewal, the licensee must submit required waivers and fingerprints pursuant to the board-approved process to facilitate a national criminal history background check. The cost for the evaluation of the fingerprint packet and the DCI and the FBI criminal history background checks will be assessed to the applicant. The board may withhold issuing a license pending receipt of a report from the DCI and the FBI.

ITEM 10. Amend subparagraph **740.11(2)“a”(2)** as follows:

(2) Verification of completion of 26 hours of continuing education within two years of application for reactivation or verification of active practice, consisting of a minimum of 2,080 hours, in another state or jurisdiction during the two years preceding an application for reactivation.

ITEM 11. Amend subparagraph **740.11(2)“b”(2)** as follows:

(2) Verification of completion of 52 hours of continuing education within two years of application for reactivation or 26 hours of continuing education within two years of application for reactivation and verification of active practice, consisting of a minimum of 2,080 hours, in another state or jurisdiction during the two years preceding an application for reactivation; or

ITEM 12. Adopt the following **new** subrule 740.11(3):

**740.11(3)** If the license has been inactive for two or more years and the licensee cannot provide verification of active practice, consisting of a minimum of 2,080 hours, in another state or jurisdiction during the two years preceding an application for reactivation, the licensee must submit required waivers and fingerprints pursuant to the board-approved process to facilitate a national criminal history background check. The cost for the evaluation of the fingerprint packet and the DCI and the FBI criminal history background checks will be assessed to the applicant. The board may withhold issuing a license pending receipt of a report from the DCI and the FBI.

ITEM 13. Renumber rules **481—740.10(147)** to **481—740.12(17A,147,272C)** as **481—740.9(147)** to **481—740.11(17A,147,272C)**.